

CAROLINE TURCO, OSB 083813
Senior Deputy City Attorney
caroline.turco@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
*Of Attorneys for Defendant City of Portland
and Bryce Askelson*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TED TIMMONS,

3:22-cv-01235-SB

PLAINTIFF,

DECLARATION OF CAROLINE TURCO

v.

**CITY OF PORTLAND, and BRYCE
ASKELSON,**

(In Support of Defendants' Motion to Make
More Definite and Certain and Motion to
Strike)

DEFENDANTS.

I, Caroline Turco, Senior Deputy City Attorney, declare as follows:

1. I am employed with the City of Portland and am the attorney assigned to this matter to represent the defendants.
2. I conferred with Juan Chavez via phone on November 7, 2022 about the issues contained in this motion but we were unable to resolve the issues.
3. I make this declaration in support of Defendants' Motion to Make More Definite and Certain and Motion to Strike.

///

///

///

///

///

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: November 16, 2022.

/s/ Caroline Turco
Caroline Turco